

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

ANGEL HERNANDEZ,

Plaintiff,

v.

THE OFFICE OF THE COMMISSIONER OF  
BASEBALL and MAJOR LEAGUE BASEBALL  
BLUE, INC.

Defendants.

No. 18 Civ. 9035 (JPO) (GWG)

**DECLARATION OF NEIL H. ABRAMSON IN SUPPORT OF  
DEFENDANTS' REPLY MEMORANDUM OF LAW IN FURTHER SUPPORT OF  
MOTION TO EXCLUDE DR. GREGORY W. BAXTER**

I, NEIL H. ABRAMSON, hereby depose and state:

1. I am a member of the firm of Proskauer Rose LLP, counsel for Defendants The Office of the Commissioner of Baseball and Major League Baseball Blue, Inc. (together, "MLB") in the above-captioned action. I am familiar with the facts set forth below and submit this Declaration on behalf of MLB in support of its Reply Memorandum of Law in Further Support of Motion to Exclude Dr. Gregory W. Baxter.

2. Attached hereto as **Exhibit A** are true and correct copies of excerpts from the deposition transcript of Denise Martin, Ph.D., taken on March 11, 2020.

3. Attached hereto as **Exhibit B** are true and correct copies of excerpts from the deposition transcript of Joe Torre, taken on June 19, 2019.

4. Attached hereto as **Exhibit C** are true and correct copies of excerpts from the deposition transcript of Peter Woodfork, taken on June 21, 2019.

I declare under penalty of perjury that the foregoing is true and correct. Executed this  
26th day of June, 2020 in South Salem, New York.

/s/ Neil H. Abramson  
NEIL H. ABRAMSON